

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

WISCONSIN RIGHT TO LIFE, INC. and
WISCONSIN RIGHT TO LIFE STATE
POLITICAL ACTION COMMITTEE,

Plaintiffs,

v.

Case No. 10-CV-0669

DAVID DEININGER, MICHAEL BRENNAN,
THOMAS BARLAND, THOMAS CANE,
GERALD NICHOL, TIMOTHY VOCKE, and
JOHN CHISHOLM,

Defendants.

DEFENDANTS' MEMORANDUM IN OPPOSITION TO
PLAINTIFFS' CIVIL LOCAL RULE 7(h) EXPEDITED NON-DISPOSITIVE
MOTION TO LIFT THE STAY AND FOR LEAVE TO AMEND THEIR COMPLAINT

Defendants David Deininger, Michael Brennan, Thomas Barland, Thomas Cane, Gerald Nichol, Timothy Vocke, and John Chisholm (collectively, "Defendants"), by their undersigned counsel, file this memorandum in opposition to the Civil Local Rule 7(h) expedited non-dispositive motion to lift the stay and for leave to amend their complaint filed by Plaintiffs Wisconsin Right to Life, Inc. and Wisconsin Right to Life State Political Action Committee (collectively, "Plaintiffs").

On March 30, 2012, Plaintiffs' counsel requested Defendants' consent to lifting the stay and to amending the complaint in this case. In conjunction with that request, Defendants' counsel requested a copy of Plaintiffs' First Amended Verified Complaint (the "FAVC"). Plaintiffs' counsel did not provide a copy of the FAVC to Defendants' counsel.

Defendants' counsel has now reviewed Plaintiffs' motion (Dkt. 66), the FAVC (Dkt. 66-41), and the accompanying exhibits that were filed with Plaintiffs' instant motion. Defendants do not oppose Plaintiffs' instant motion.

Dated this 6th day of April 2012.

Respectfully submitted,

/s/ Clayton P. Kawski

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